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May 24, 2011

VIA EMAIL AND U.S. MAIL

Jeff S. Jordan, Esq.
Federal Election Commission
Washington, DC 20463

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FEDERAL ELECTION
COMMISSION

RE: MUR 6465: Response of Respondents Natalie and Richard Wisneski
(the "Wisneskis")

Dear Mr. Jordan:

Our firm represents the Wisneskis with respect to the Complaint (the "Complaint") made to the Federal Election Commission (the "Commission") by the Citizens for Responsibility and Ethics in Washington filed on April 5, 2011 against The Arizona Sports Foundation (the "Bowl") and various others, including the Wisneskis. Please accept the following as the response on behalf of the Wisneskis. We anticipate this response will address all concerns the Commission may have in regard to the Complaint.

As you already know, Natalie Wisneski was the former Chief Operating Officer of the Fiesta Bowl. She resigned from her position effective March 25, 2011, not as part of any separation or severance agreement. Ms. Wisneski was a long term and faithful employee of the Bowl for many years, joining in 1989 and holding various positions at the Bowl up until her resignation date. Ms. Wisneski started as an accounting clerk, and through her hard work and dedication, was promoted to more senior positions within the Bowl. All current and ex-employees of the Bowl will speak highly of Ms. Wisneski's character; as well as her devotion, the tireless hours she spent, and the loyalty she has displayed during her tenure.

Mr. Wisneski is the husband of Ms. Wisneski and the "stay at home" father of their children. Mr. Wisneski is not and has never been employed by the Bowl.

With respect to the substance of the Complaint, please be advised that all allegations contained therein are currently the subject of criminal investigations being handled by the Arizona State Attorney General's Office, the Maricopa County Prosecutor's Office, and the United States Attorney's Office for the District of Arizona. Not to minimize the seriousness of the allegations, but three separate prosecuting agencies are already investigating and considering criminally prosecuting this matter. For the Commission to also investigate and potentially seek sanctions against the Wisneskis seems, respectfully, redundant and not productive.

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You should be aware that Ms. Wisneski cooperated fully with the Bowl's Special Committee and the attorneys of Robins, Kaplan, Miller and Ciresi LLP, the firm which investigated and authored the report mentioned in the Complaint (and is the source of the Complaint). Although she did not have to do so, Ms. Wisneski chose to completely assist with the investigation and was interviewed on six different dates by investigating attorneys Christopher Madel and Bruce Manning, beginning in December 2010 and continuing into March 2011. Most of these interviews lasted the full business day. Ms. Wisneski was entirely honest and forthright in the interviews and with the information she provided, and we believe her cooperation proved invaluable to the Special Committee.

As part of the interview process, the investigating attorneys also requested that Ms. Wisneski review on her own time (outside of the interviews) hundreds of records and documents, asking her to provide information and explain the significance of them. Ms. Wisneski spent countless hours reviewing these records for the investigators, and gave information that the investigators would not have known except for Ms. Wisneski's cooperation. As is obvious from the report, Ms. Wisneski was vital and instrumental to the investigation, and both Mr. Madel and Mr. Manning commended her at various times regarding her candor and assistance.

We hope that the foregoing has addressed all issues raised in the Complaint regarding the Wisneskis. In sum, all allegations raised in the Complaint are being addressed by the criminal prosecuting authorities, Ms. Wisneski completely cooperated with the Bowl's own investigating attorneys, and Ms. Wisneski resigned from her position as Chief Operating Officer of the Bowl.

If you have any questions or concerns regarding this response, I request that you contact me at the above email address or call me directly at 602-229-5768.

Thank you for your attention to this matter.

Sincerely,

QUARLES & BRADY LLP


James L. Burke